
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
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MICAHA REAGOR :

I, Lucille M. Pezzullo, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about September 29, 2006, in Hudson County, in the District of New Jersey, and elsewhere, defendant MICAHA REAGOR did:

knowingly and wilfully possess material which contained at least three images of child pornography, as defined in 18 U.S.C. § 2256, which were shipped and transported in interstate and foreign commerce, including by computer, and were produced using materials that were shipped and transported in interstate and foreign commerce, including by computer,

in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

I further state that I am a Special Agent for United States Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Lucille M. Pezzullo, Special Agent
Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,
October 17, 2006 at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, Lucille M. Pezzullo, a Special Agent with United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On or about September 29, 2006, law enforcement officers conducted a search of 350 Wayne Street, Top Floor, Jersey City, New Jersey, the residence of defendant Micah Reagor (hereinafter “defendant REAGOR”).

2. On or about September 29, 2006, law enforcement officers reviewed the contents of defendant REAGOR’s computer hard drive which had been found in defendant REAGOR’s residence. Among the files on the hard drive, which was manufactured in Thailand, were more than four hundred (400) images and videos of what appear to be child pornography, as defined by Title 18, United States Code, Section 2256(8). Three of the images, which were found on defendant REAGOR’s computer hard drive, are described as follows:

- a. **Image Number One:** This image depicts a prepubescent female who appears to be performing fellatio on a pubescent male. The female appears to be fully nude and is visible from her sternum to her head. The female is seated on a multi-colored surface with a pink-colored wall behind her. Her left leg is bent up at the knee and is extended out to the side, where it rests on the multi-colored surface. The left arm of the female is held straight out and is pointing away from her body. The right arm of the female is bent at the elbow with the right hand of the female is placed on the erect penis of the pubescent male. The pubescent male appears to be fully nude and is visible from the lower abdomen to the genital area.
- b. **Image Number Two:** This image depicts a prepubescent female engaged in sexual conduct with a pubescent male. The female is visible from her head to her upper thighs. She is wearing a multi-colored shirt which is pulled up to her stomach, and she is nude below the sternum. The female is lying on her back on a white surface with multi-colored flowers. The legs of the female are bent up at the knees and parted out to the side, thereby exposing her genital area, and both of her hands are placed on the hem of her shirt. The erect penis of the pubescent male is partially visible directly over the genital area of the prepubescent female.
- c. **Image Number Three:** This image depicts a prepubescent female displaying her genital and pubic area in a lascivious manner. The female is fully nude and is visible from her head to her genital area. The female is lying on her back on a multi-colored surface, with her head resting on a blue surface. The arms of the female are stretched out to the sides and are

resting on the multi-colored surface. Her undeveloped breasts and genitals are visible.

3. Based upon my training and experience, and to the best of my knowledge, the images described in paragraphs 2a through 2c above, were downloaded from the Internet, based upon, among other things, defendant REAGOR's own statements.

4. On or about September 29, 2006, law enforcement agents interviewed defendant REAGOR who stated, in substance and in part, that a) he had purchased and downloaded images and videos of child pornography from the Internet to the hard drive of his computer; b) that he believed that the images of child pornography he had viewed depicted actual children; and c) that he attempted to disassemble his computer to avoid detection by law enforcement agents.